

Message

From: Yan, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4E2C11D82EEF4451BA0F6F6B0FCE82B7-YAN, JAMES]
Sent: 8/5/2020 12:39:31 PM
To: Mozucha, Steven [steven.mozucha@evonik.com]; Stanley, Darrell [stanley.darrell@epa.gov]
CC: Sullivan, Andrew [sullivan.andrew@epa.gov]
Subject: RE: P-xx-0398 and P-xx-0407
Attachments: P-XX-0407_ENG Report_06-26-20_Redacted.pdf; P-XX-0407exp1_Redacted.pdf

Here are the reports for your case. I will follow up separately with the password. Please confirm receipt of the files and let us know if you have any questions about accessing the files. Thank you.

James Jie Yan, Ph.D.

Chemist/Presidential Management Fellow
New Chemicals Management Branch
Chemical Control Division
Office of Pollution Prevention and Toxics
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Phone: 202-564-2138
Fax: 202-564-9490
Do not send CBI to this email

From: Mozucha, Steven <steven.mozucha@evonik.com>
Sent: Tuesday, August 4, 2020 9:57 AM
To: Stanley, Darrell <stanley.darrell@epa.gov>
Cc: Yan, James <Yan.James@epa.gov>; Sullivan, Andrew <sullivan.andrew@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

Let's try again.

Steven Mozucha
Product Regulatory Sr. Specialist | ESHQ Services | North America
P +1 804 727-0645 | F +1 804 727-0917 | steven.mozucha@evonik.com

Evonik Corporation, Richmond B&I Center
7801 Whitepine Road | Richmond, VA 23237 | USA
Evonik in North America
[LinkedIn](#) | [Twitter](#) | [Instagram](#) | [Facebook](#)

This message and any attachments are the property of Evonik Industries AG and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>
Sent: Tuesday, August 04, 2020 9:55 AM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Cc: Yan, James <Yan.James@epa.gov>; Sullivan, Andrew <sullivan.andrew@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

I think you forgot the attachment. Please re-send.

Thanks,
-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>
Sent: Tuesday, August 4, 2020 9:49 AM
To: Stanley, Darrell <stanley.darrell@epa.gov>
Cc: Yan, James <Yan.James@epa.gov>; Sullivan, Andrew <sullivan.andrew@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

Darrell,
Please find attached the signed letter.
Thanks,
Steven

Steven Mozucha
Product Regulatory Sr. Specialist | ESHQ Services | North America
P +1 804 727-0645 | F +1 804 727-0917 | steven.mozucha@evonik.com

Evonik Corporation, Richmond B&I Center
7801 Whitepine Road | Richmond, VA 23237 | USA
Evonik in North America
[LinkedIn](#) | [Twitter](#) | [Instagram](#) | [Facebook](#)

This message and any attachments are the property of Evonik Industries AG and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>
Sent: Monday, August 03, 2020 2:16 PM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Cc: Yan, James <Yan.James@epa.gov>; Sullivan, Andrew <sullivan.andrew@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

Could you please fill out, sign, and return the attached form so that we can email the requested reports to you? Case number and contact info.

Please let me know if you have any questions.

Thanks,
-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>
Sent: Monday, August 3, 2020 9:36 AM

To: Stanley, Darrell <stanley.darrell@epa.gov>

Subject: RE: P-xx-0398 and P-xx-0407

Darrell,
Please start the process of sanitizing them to get me copies of the reports.
Thanks,
Steven

Steven Mozucha

Product Regulatory Sr. Specialist | ESHQ Services | North America

P +1 804 727-0645 | F +1 804 727-0917 | steven.mozucha@evonik.com

Evonik Corporation, Richmond B&I Center

7801 Whitepine Road | Richmond, VA 23237 | USA

Evonik in North America

[LinkedIn](#) | [Twitter](#) | [Instagram](#) | [Facebook](#)

This message and any attachments are the property of Evonik Industries AG and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>

Sent: Monday, August 03, 2020 9:30 AM

To: Mozucha, Steven <steven.mozucha@evonik.com>

Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

I will send this new information to the engineer and either he or I will let you know if there are any additional questions.

Regarding 407, the Engineering and Exposure reports have been revised with the new information. Unfortunately, the inhalation exposures actually increased and there is also still eco risk from the water releases. This is partially due to the large increase in PV from the initial assessment. I can sanitize and send both of those reports to you.

Thanks,
-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>

Sent: Friday, July 31, 2020 4:36 PM

To: Stanley, Darrell <stanley.darrell@epa.gov>

Subject: RE: P-xx-0398 and P-xx-0407

Hey Darrell,

I just wanted to let you know that I resubmitted the PMN this afternoon for P-xx-398. I added two new attachments. The first was new Vapor Pressure data. The second was Matt's (our process engineer) responses to EPA's most current engineering report. There were quite a few items that he addressed.

We've been talking a lot lately about the intermediate (P-xx-0398). Where do we stand on the final product (P-xx-0407)? I don't recall us speaking about this PMN after EPA's last assessment. Is there a revised Health and Engineering Report? If so, can I get a copy of them and can we have a conversation about where we stand. Matt actually brought this up after he went through the Engineering report and noticed all of the information in there that was not consistent with what we actually had in our PMN.

Thanks,
Steven

Steven Mozucha
Product Regulatory Sr. Specialist | ESHQ Services | North America
P +1 804 727-0645 | F +1 804 727-0917 | steven.mozucha@evonik.com

Evonik Corporation, Richmond B&I Center
7801 Whitepine Road | Richmond, VA 23237 | USA
Evonik in North America
[LinkedIn](#) | [Twitter](#) | [Instagram](#) | [Facebook](#)

This message and any attachments are the property of Evonik Industries AG and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>
Sent: Thursday, July 23, 2020 2:53 PM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Ok, I'll set it up for Tuesday at 2 and will send out a meeting invite. Did you have any information in addition to the email below? Also, did you want to discuss 407?

From: Mozucha, Steven <steven.mozucha@evonik.com>
Sent: Thursday, July 23, 2020 2:47 PM
To: Stanley, Darrell <stanley.darrell@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

Darrell,
The proposed time on Tuesday works for our engineer.
Thanks,
Steven

Steven Mozucha
Product Regulatory Sr. Specialist | ESHQ Services | North America
P +1 804 727-0645 | F +1 804 727-0917 | steven.mozucha@evonik.com

Evonik Corporation, Richmond B&I Center
7801 Whitepine Road | Richmond, VA 23237 | USA
Evonik in North America
[LinkedIn](#) | [Twitter](#) | [Instagram](#) | [Facebook](#)

This message and any attachments are the property of Evonik Industries AG and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>
Sent: Thursday, July 23, 2020 2:28 PM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

I thought the engineer was going to just re-run the report, but he has instead requested a call with your engineer. Do any of the following times next week work for you?

Tuesday 2-4

Wednesday 2:30-4

Thursday 1-3.

Thanks,
-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>

Sent: Friday, July 17, 2020 1:40 PM

To: Stanley, Darrell <stanley.darrell@epa.gov>

Subject: RE: P-xx-0398 and P-xx-0407

Darrell,

While I was on vacation our process engineer was able to get some distillation data which may better help EPA understand the volatility of the PMN substance. I have attached that along with a revised SDS which now has a slightly different boiling point than it originally did. Additionally, there's an attachment with our process engineer's comments regarding the volatility discrepancy between EPA and Evonik. I re-submitted the PMN earlier and it should be available. I'm attaching below our process engineer's comments regarding this situation. He (as well as all of Evonik's technical people) believe there is a big misunderstanding with how EPA views this chemistry. It could possible be the way this information was originally submitted. In our last e-mail we had discussed setting up a call between our process engineer, myself and EPA's engineer to explain the situation. Now that everyone is back in the office, can we do this? I'm available all next week, except for Tuesday morning. Is it possible to do this through a Teams call?

Process Engineer's comments

The physical properties contained in the PMN attachment "Report No. 126939v1.phys.pdf" are based on a sample of the reactor **crude** PC206 Intermediate which is a mixture of water, other low boiling components, and the notified substance "PC206 Intermediate". The boiling point and vapor pressure reported on Page 2 of that document are mixture properties and not properties of PC206 Intermediate" itself. From the TGA Boiling Point Plot shown in Figure 3 of the physical properties report, it can be seen that the boiling point of PC206 Intermediate is between 240C-250C.

We also have laboratory distillation data showing the boiling point of PC206 Intermediate at vacuum conditions, which is approximately 140.2C at 38.4 mmHg.

For further clarification, some of the documentation refers to the notified substance as "PC206 Intermediate" but it can also be referred to as "DIP-DETA". The absence of the word "crude" is meant to refer to the pure notified substance. When "crude" is included it is referring to the mixture as it leaves the reactor - water, lights, PC206 Intermediate, and heavy byproducts

Best Regards,
Steven

Steven Mozucha
Product Regulatory Senior Specialist
Nutrition & Care
Environmental Health Safety & Quality
Phone +1 804 727-0645
Fax +1 804 727-0917
steven.mozucha@evonik.com

Evonik Corporation
7801 Whitepine Road

Richmond, VA 23237
<http://www.evonik.com>

This message and any attachments are the property of Evonik Industries and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>
Sent: Friday, June 26, 2020 8:12 AM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

I just heard back from the engineer and he is out of the office next week. Please send me the feedback from your engineer at your earliest convenience and I will pass it on to our engineer. Hopefully we can schedule a call when everyone is back in the office.

Thanks,
-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>
Sent: Thursday, June 25, 2020 3:17 PM
To: Stanley, Darrell <stanley.darrell@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

I'm asking for feedback from our engineer now. Is there any way we could do the call next Monday, Tuesday or Wednesday. I'm out of the office tomorrow and on vacation starting July 2.

Thanks,
Steven

Steven Mozucha
Product Regulatory Senior Specialist
Nutrition & Care
Environmental Health Safety & Quality
Phone +1 804 727-0645
Fax +1 804 727-0917
steven.mozucha@evonik.com

Evonik Corporation
7801 Whitepine Road
Richmond, VA 23237
<http://www.evonik.com>

This message and any attachments are the property of Evonik Industries and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>
Sent: Thursday, June 25, 2020 2:12 PM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

The engineer used the vapor pressure that was submitted with the PMN extrapolated to the temperature during the specific processes. Is there some reason that they should have used some other information?

I can set up a call, it might be helpful if you could send us a specific question or comment in advance.

Thanks,
-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>

Sent: Thursday, June 25, 2020 1:44 PM

To: Stanley, Darrell <stanley.darrell@epa.gov>

Subject: RE: P-xx-0398 and P-xx-0407

Hi Darrell,

I just had a call with our business line which included our Senior Process Engineer. He stated that the PMN substance is actually not volatile. He looked at the documentation submitted and he believes that there is some confusion regarding that information that your engineer is looking at. They want to know if it is possible to have a call with your engineer, him (our Senior Process Engineer) and myself. Is this possible?

Thanks,
Steven

Steven Mozucha
Product Regulatory Senior Specialist
Nutrition & Care
Environmental Health Safety & Quality
Phone +1 804 727-0645
Fax +1 804 727-0917
steven.mozucha@evonik.com

Evonik Corporation
7801 Whitepine Road
Richmond, VA 23237
<http://www.evonik.com>

This message and any attachments are the property of Evonik Industries and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>

Sent: Wednesday, June 24, 2020 11:16 AM

To: Mozucha, Steven <steven.mozucha@evonik.com>

Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

I just wanted to give you a quick update. They have completed the revision on the engineering report for xx-xx-x398 and it does not look like there has been a significant reduction in the inhalation exposures. I asked the engineer about this and he said that it is a volatile substance and the processes are taking place at high temperatures, so the release of vapor is expected.

We can continue with the revisions of the exposure and human health reports, but I don't expect the resulting worker risks to be significantly reduced from the initial assessment.

Please let me know if you have any questions. I can send you a sanitized version of the engineering report if you like.

Thanks,
-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>
Sent: Wednesday, June 17, 2020 12:35 PM
To: Stanley, Darrell <stanley.darrell@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

Hi Darrell,
I just wanted to let you know that I have submitted the explanation the engineer requested in CDX. CDX says that it is "submitted", so hopefully you should be able to get it. The information you asked for is a new 1 page attachment within the PMN.
Thanks,
Steven

Steven Mozucha
Product Regulatory Senior Specialist
Nutrition & Care
Environmental Health Safety & Quality
Phone +1 804 727-0645
Fax +1 804 727-0917
steven.mozucha@evonik.com

Evonik Corporation
7801 Whitepine Road
Richmond, VA 23237
<http://www.evonik.com>

This message and any attachments are the property of Evonik Industries and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Stanley, Darrell <stanley.darrell@epa.gov>
Sent: Tuesday, June 16, 2020 11:57 AM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Subject: RE: P-xx-0398 and P-xx-0407

[Email from external Sender]

Hi Steven,

The engineer is currently working on this case and had a question regarding xx-xx-x398. Could you please provide an explanation of the method and equations used to estimate the moles of DIPDETA at the beginning and end in the reactor? This is from Appendix B: Dynamic Simulation Calculations for Reactor Vent to Flare.

Once you have the information, it would be best if you could submit it through CDX as an amendment to the case.

Let me know if you have any questions.

Thanks,

-Darrell

From: Mozucha, Steven <steven.mozucha@evonik.com>
Sent: Thursday, June 11, 2020 5:30 PM
To: Le, Madison <Le.Madison@epa.gov>
Cc: Stanley, Darrell <stanley.darrell@epa.gov>
Subject: RE: P-xx-0398 and P-xx-0407

Hello Madison and Darrell,
After speaking with Madison on Tuesday, we reached out to our consultant who was working with us on these two PMN's and expressed the urgency on these. We've worked nonstop since that point and the two PMN amendments have been submitted through CDX. I just wanted to give you a heads-up that the new and amended data was in. I left a voicemail with Darrell, however I couldn't leave a voicemail with Madison because your mailbox is full. When you're able to access the data can you please confirm with me that you received it.
Best Regards,
Steven

Steven Mozucha
Product Regulatory Senior Specialist
Nutrition & Care
Environmental Health Safety & Quality
Phone +1 804 727-0645
Fax +1 804 727-0917
steven.mozucha@evonik.com

Evonik Corporation
7801 Whitepine Road
Richmond, VA 23237
<http://www.evonik.com>

This message and any attachments are the property of Evonik Industries and its subsidiaries, are confidential, and may be privileged or otherwise protected from disclosure. This message is intended solely for the use of the addressee. If you receive this e-mail in error, please telephone or e-mail the sender and delete this message and any attachments from your system. If you are not the intended recipient you are strictly prohibited from disclosing, copying, distributing or using any of this information.

From: Le, Madison <Le.Madison@epa.gov>
Sent: Tuesday, June 09, 2020 1:54 PM
To: Mozucha, Steven <steven.mozucha@evonik.com>
Cc: Stanley, Darrell <stanley.darrell@epa.gov>
Subject: FW: P-xx-0398 and P-xx-0407
Importance: High

[Email from external Sender]

Steven,

I would like to speak to you regarding two cases (P-xx-0398 and P-xx-0407). I would like to find a path forward as soon as possible. Please call me at 202-507-3062 to discuss further.

I also left you a voicemail. Thank you.

Madison H. Le
Division Director
Chemical Control Division
USEPA/OCSPP/OPPT
Cell: 202-507-3062

ED_006353A_00246853-00009